

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (READING)**

In re: Robert Joseph Krobeth and : Chapter 12  
Melanie Ann Krobeth :  
Debtors : Case 4:16-bk-13342

HEARING DATE:  
June 2, 2022 11:00 a.m.

**NOTICE OF WITHDRAWAL OF MOTION TO DISMISS**

Fulton Bank, N.A., by and through its counsel, Brown McGarry Nimeroff LLC, hereby provides Notice of Withdrawal without prejudice of its Motion to Dismiss Case for Failure to Make Plan Payments Pursuant to 11 U.S.C. § 1208 (Doc 127) filed on January 24, 2022.

**BROWN McGARRY NIMEROFF LLC**

Dated: June 1, 2022 By: */s/Scott M. Klein*  
Scott M. Klein, Esquire  
Email: [slein@bmnlawyers.com](mailto:slein@bmnlawyers.com)  
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**CERTIFICATE OF SERVICE**

I, Scott M. Klein, Esquire, hereby certify that on June 1, 2022, I served a copy of the foregoing Notice of Withdrawal of Motion on all counsel of record or pro se parties identified below either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized method for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing. I certify under penalty of perjury that the foregoing is true and correct.

David B. Schwartz, Esquire  
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*Chapter 12 Trustee*

Office of the U.S. Trustee  
833 Chestnut Street, Suite 500  
Philadelphia, PA 19107  
*United States Trustee*

**BROWN McGARRY NIMEROFF LLC**

Dated: June 1, 2022

By: */s/ Scott M. Klein*  
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